

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	
Frederick Dandridge	:	
	:	Chapter 13
	:	
Debtors	:	Case No.: 16-18688MDC

MOTION TO MODIFY PLAN AFTER CONFIRMATION

The Debtor, Frederick Dandridge, by and through their undersigned counsel, hereby move to modify her Chapter 13 Plan and in support thereof aver as follows:

1. Debtor filed a Chapter 13 Bankruptcy on or about December 20, 2016.
2. The Chapter 13 filing was assigned case number 16-18688MDC.
3. The Chapter 13 Plan was confirmed by this Honorable Court on or about January 17, 2018.
4. On or about February 27, 2019 the Debtor and the mortgagee, entered into a Stipulation resolving the pending Motion for Relief.
5. Per the February 27, 2019 Stipulation, the Debtor is delinquent in the sum of \$5,834.04 in post-petition mortgage payments. A true and correct copy of the February 27, 2019 Stipulation is attached hereto as **Exhibit "A."**
6. In accordance with the February 27, 2019 Stipulation, specifically, paragraph number 1(a) the Debtor will cure the subject \$5,834.04 by amending the Chapter 13 within 30 days of the entry of the Order.
7. In furtherance of the Stipulation and the Debtor curing the post-petition delinquency, this Motion and Modified Chapter 13 Plan are being contemporaneously filed.

8. The Debtor's proposed modified Chapter 13 Plan, attached hereto as "**Exhibit B**", increases the Debtor's Plan payment by approximately \$313.00 per month (including attorney and trustee fees) and is deemed affordable by the Debtor.

WHEREFORE, the Debtor requests that she be permitted to modify her Chapter 13 Plan for the above-stated reasons.

Dated: March 22, 2019

/s/Brad J. Sadek, Esq
Brad J. Sadek, Esq.
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